

Attachment 2



STATE OF RHODE ISLAND AND PROVIDENCE

Department of Environmental Management
 DIVISION OF SITE REMEDIATION
 291 Promenade Street
 Providence, R.I. 02908-5767

Post-It™ brand fax transmittal memo 7671		# of pages	2
To	J. Brown	From	G. FINE
Co.		Co.	RIDEM
Dept.		Phone #	401 277 3372
Fax #		Fax #	401 277 2017

James M. Brown, P.E., R.E.M.
 Remedial Project Manager
 Rhode Island Superfund Section
 U.S. Environmental Protection Agency
 John F. Kennedy Federal Building
 Boston, MA 02203-2211

July 28, 1995

Re: DRAFT Work Plan for Baseline Risk Assessment of Operable Unit 2,
 Central Landfill, Johnston, Rhode Island

Dear Mr. Brown:

The Division has reviewed the above referenced document and offers the following comments for review and response.

1. Page 13, Section 2.30 DOSE-RESPONSE ASSESSMENT:
 Paragraph 1.

Because U.S. EPA has withdrawn its dose-response value for lead, GZA proposes to evaluate lead only via comparison to applicable or suitably analogous public health standards and guidelines (i.e., ARARs). Based on currently available information, it appears unlikely that the exposure point concentrations for lead in OU2 will exceed EPA's draft SSL of 400 ppm.

As stated on page 21, paragraph 1, the Rhode Island Department of Health has promulgated Environmental Lead Standards which do not correspond to the SSL lead concentration. The existing standard for lead in (residential) soil without any Environmental lead Management Plan in effect is 150 ppm.

2. Page 16, Section 2.42.1 Potential Human Receptors and Exposure Points:
 Paragraph 4.

To evaluate swimming exposures in the reservoirs, we will assess potential chronic exposure for 7- to 37-year-old child and adult residents.

Please clarify why local resident children less than 7 years of age have been precluded from this risk assessment approach. Many default exposure durations consider children from ages 1 to 6. (This comment is not specific to the above citation only. This approach never considers children less than 7 in the risk evaluation).


3. Page 16, Section 2.42.1 Potential Human Receptors and Exposure Points:
Paragraph 3.

We believe that this assessment approach will likely overestimate potential risks associated with the possible uses of groundwater in the Study Area, considering the institutional controls over groundwater use which is mandated by Rhode Island regulations.

Please specify more clearly what is meant by this statement. Is this statement in reference to the buffer zones only?

If you have any questions or would like to discuss any of these issues then please feel free to contact me at (401) 277-3872 ext. 7139.

Sincerely,



Greg S. Fine, P.E., Acting Principal Engineer
Division of Site Remediation

cc: Warren S. Angell, RIDEM - DSR